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**COUNSEL FOR SEACRET DIRECT, LLC  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**IN RE:** § **SPHERATURE INVESTMENTS LLC,  
*et al.*,** § **Chapter 11**  
**DEBTORS.<sup>1</sup>** § **Case No. 20-42492**  
§ **Jointly Administered**

**WITNESS AND EXHIBIT LIST**

Seacret Direct, LLC ("Seacret") files this Witness and Exhibit List and designates the following witnesses and exhibits in connection with the **October 21, 2021, at 1:30 P.M. (CST)** hearing in the above-referenced case.

**WITNESSES<sup>2</sup>**

1. Izhak Ben Shabat;
2. Boaz Yadin;
3. Kenneth E. "Eddie" Head;
4. Wayne Nugent;

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<sup>1</sup> The "Debtors" in the above-captioned jointly administered chapter 11 bankruptcy cases ("Cases") are: Spherature Investments LLC ("Spherature") EIN#5471; Rovia, LLC ("Rovia") EIN#7705; WorldVentures Marketing Holdings, LLC ("WV Marketing Holdings") EIN#3846; WorldVentures Marketplace, LLC ("WV Marketplace") EIN#6264; WorldVentures Marketing, LLC ("WV Marketing") EIN#3255; WorldVentures Services, LLC ("WV Services") EIN#2220.

<sup>2</sup> The following may be called by live testimony, deposition, transcript, recording, or other means.

5. Michael Poates;
6. Eric Haynes;
7. Any other representative of the Debtors;
8. Any witness designated or called by any other party; and
9. Any impeachment or rebuttal witnesses.

### EXHIBITS

<b>Exhibit</b>	<b>Description</b>	<b>Off.</b>	<b>Obj.</b>	<b>Adm.</b>
A.	Limited Solicitation Agreement, dated November 11, 2020			
B.	Debtors' Motion to Approve Immaterial Modifications to the Debtors' Third Amended Chapter 11 Plan of Reorganization [Docket. No. 476] filed September 29, 2021 (the "False Redline")			
C.	Certificate of Notice Notice of Filing of Amended Redline of Disclosure Statement [Docket. No. 528] filed October 13, 2021 (the "Real Redline")			
D.	<a href="https://cases.stretto.com/Spherature/">https://cases.stretto.com/Spherature/</a> (accessed and printed on October 8, 2021)			
E.	<a href="https://cases.stretto.com/Spherature/court-docket/court-docket-category/713-plan-solicitation/">https://cases.stretto.com/Spherature/court-docket/court-docket-category/713-plan-solicitation/</a> (accessed and printed on October 8, 2021)			
F.	Notice of Combined Hearing and Deadline to Object to the Debtors' Plan (sent to Winstead PC)			
G.	Emergency Motion for Status Hearing on the Debtors' Confirmation Hearing [Docket. No. 510]			
H.	Declaration of Erik Toth in Support of the Debtors' Emergency Motion for Status Hearing on Debtors' Confirmation Hearing [Docket. No. 510-1]			
I.	Communication from "WorldVentures Corporate"			
J.	Order: (I) Conditionally Approving Disclosure Statement; (II) Establishing Procedures for Solicitation and Tabulation of Votes on Plan; (III) Establishing Procedures for Submission of Topping Bids; (IV) Approving Certain Forms and Notices; (V) Scheduling a Combined Hearing on Final Approval of Disclosure Statement and Confirmation of Plan; and (VI) Granting Related Relief [Docket No. 448]			
K.	Third Amended Joint Chapter 11 Plan of Spherature Investments LLC and its Debtor Affiliates [Docket No. 445]			

Exhibit	Description	Off.	Obj.	Adm.
L.	Disclosure Statement for the Third Amended Joint Chapter 11 Plan of Spherature Investments LLC and its Debtor Affiliates [Docket No. 446]			
M.	Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and Its Debtor Affiliates [Docket No. 459]			
N.	Disclosure Statement for the Fourth Amended Joint Chapter 11 Plan of Spherature Investments LLC and its Debtor Affiliates [Docket No. 460]			
O.	WorldVentures Marketing, LLC, Schedule G [Case No. 20-42494; Docket No. 22]			
P.	Notice of No Auction with Respect to the Sale of Substantially All of the Debtors' Assets [Docket No. 485]			
Q.	Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Prepetition Wages and Other Employee-Benefit Claims[Docket No. 16]			
R.	Motion to Compel Assumption or Rejection of Limited Solicitation Agreement [Docket No. 494]			
S.	Michael Poates recording			
T.	PPP Loan Data related to the Debtors			
U.	Transcript - Deposition of Michael Poates, March 10, 2021			
V.	Claims information related to priority claims			
W.	Seacret Bid Package			
X.	[Intentionally left blank]			
Y.	Co-Marketing Agreement, dated July 22, 2020			
Z.	WorldVentures Marketing, LLC Privacy Policy			
AA.	Plaintiffs' First Amended Complaint, Adversary No. 21-04058, Docket No. 76			
BB.	Amended Complaint and Request for Preliminary Injunction, Adversary No. 21-04059, Docket No. 6			
CC.	Letter of Intent, dated November 10, 2020			
DD.	Form of New Employment Agreements with Verona International Holdings, Inc.			
EE.	MACC Investments Group Website			

Exhibit	Description	Off.	Obj.	Adm.
FF.	Plaintiffs' Objection and Reponses to Defendant's Corporate Representative Topics (Adversary Case No. 21-04058)			
GG.	Declaration of Michael Poates in Support of Plaintiffs' Emergency Application for a Temporary Restraining Order and Preliminary Injunction and Supporting Memorandum [Adversary Case No. 21-04058, Docket No. 2, Exhibit A and all attachments thereto]			
HH.	Declaration of Eric Haynes [Adversary Case No. 21-04058, Docket No. 53]			
II.	Declaration of Justin Sparks [Adversary Case No. 21-04058, Docket No. 54]			
JJ.	Declaration of Byron Schrag [Adversary Case No. 21-04058, Docket No. 55]			
KK.	Declaration of Izhak Ben Shabat [Adversary Case No. 21-04058, Docket No. 56]			
LL.	Declaration of Matt Morris [Adversary Case No. 21-04058, Docket No. 57]			
MM.	Declaration of Muzafer Najfi [Adversary Case No. 21-04058, Docket No. 58]			
NN.	Declaration of Kenneth E. Head [Adversary Case No. 21-04058, Docket No. 60]			
OO.	Subpoena of Michael Poates			
PP.	Return of Service for Michael Poates			
QQ.	Any impeachment or rebuttal exhibits or any exhibits designated by any other party			
RR.	Any pleadings, reports, or other documents filed in Bankruptcy Case No. 20-42492 (including the cases jointly administered with the foregoing bankruptcy) and any adversary or appeal related to the foregoing bankruptcy cases (including Adversary Case Nos. 21-04058 & 21-04059.			

Seacret reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing and/or in compliance with the Local Bankruptcy Rules and the orders of this Court. Seacret further reserves the right to provide any documents amended or supplemented in this Witness and Exhibit List to opposing counsel and to this Court as they become available.

**DATED: October 18, 2021.**

Respectfully submitted,

By: /s/ Phillip Lamberson

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**ATTORNEYS FOR  
SEACRET DIRECT, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2021, notice of this document was electronically mailed, along with the exhibits that are not pleadings filed in this case, to the parties registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Phillip Lamberson

One of counsel